Revised 08/91

3c

RCRA INSPECTION TRACKING

COMPANY DATA

EPA ID NUMBER: NJD001340686 FACILITY NAME: DANIEL PRODUCTS CO.
MANDATORY (Y/N) N LAND BAN (Y/N) Y FEE (Y/N) Y FY/QUARTER: 92/3
CONTACT: DENNIS KELEMEN FACILITY PHONE: (201) 432-0800
COUNTY/MUNICIPAL CODE 09 06 FACILITY STREET: 400 CLAREMONT AVE.
CITY: JERSEY CITY STATE NJ ZIP: 07304
CORPORATE NAME: (SAME AS ABOVE) STREET:
CITY: STATE ZIP:
CONTACT: FILE NUMBER 09-06-49 Region code M

MAILING INFORMATION ** (IF DIFFERENT FROM ABOVE) **

NAME TELEPHONE
CONTACT TITLE
STREET
CITY STATE ZIP

INITIAL INSPECTION (X)

INSPECTION DATE: 2-24-92 SITE VISIT (Y/N) Y
REGULATORY STATUS CODE 01 EVALUATION TYPE CODE 01 GRANT CODE 01
DATE NOV ISSUED NONE ISSUED SCHEDULED COMPLIANCE DATE
INSPECTOR/REVIEWER S. SZARDENINGS DATE ASSIGNED DATE REVIEWED
DATE VIOLATIONS REFERRED INCIDENT CASE NUMBER

FOLLOW-UP INSPECTION ( )

INSPECTION DATE: SITE VISIT (Y/N)
INITIAL INSPECTION DATE: VERIFIED COMPLIANCE DATE
EVALUATION TYPE CODE GRANT CODE
INSPECTOR/REVIEWER DATE REPORT REVIEWED

AREA OF EVALUATION

		GW	CLO	$$$	PTB	SCH	MNF	LDB	OTH
CLASS OF	I*						O		O
VIOLATION	I						O	Z	O
	II						O		O

Z=UNDETERMINED OR UNDER INVESTIGATION
O=NO VIOLATION
X=VIOLATION

GW = Ground Water CLO = Closure $$$ = Financial Responsibility PTB = Part B
SCH = Compliance Schedule MNF = Manifest LDB = Land Ban OTH = Other

COMMENTS:

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: DANIEL PRODUCTS COMPANY

FILE NUMBER: 09-06-49

VHT FACILITY FILE NUMBER:

PERMIT #:

REGION: M

INSPECTION DATE: FEBRUARY 24, 1992

INCIDENT/CASE NUMBER:

INSPECTION TYPE: RCRA-GEN/LDB

RESPONSIBLE AGENCY CODE: S

INSPECTOR'S NAME: STEPHAN SZARDENINGS

INSPECTOR'S AGENCY: NJDEPE-DFWE

INSPECTOR'S BUREAU: METRO

EPA ID NUMBER: NJD001340686

ADDRESS: 400 CLAREMONT AVE.
JERSEY CITY, N.J. 07305

LOT: 12, 16 BLOCK: 1774

COUNTY: HUDSON

FACILITY PERSONNEL: DENNIS KELEMEN
ASST. PLANT MANAGER

TELEPHONE #: (201) 432-0800

OTHER STATE/EPA PERSONNEL:

REPORT PREPARED BY: S.S. 3/3/92

REVIEWED BY: M Sterling

DATE OF REVIEW: 3/16/92

REVISION: 3
01/88

TIME IN: _____

TIME OUT: _____

PHOTOS TAKEN (__) YES (√) NO IF YES, HOW MANY? _____

SAMPLE TAKEN (__) YES (√) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (√) YES (__) NO

Number of manifests in compliance 18

Number of manifests not in compliance 0

List manifest document numbers of those manifests not in compliance.

On 2/24/92, I conducted a RCRA inspection at the Daniel Products Company (DPC), in Jersey City, N.J. The facility representatives were Mr. Dennis Kelemen-Asst. Plant Manager, Joe Viso, and Eugene Tesch.

DPC is a manufacturer of various pigment additives, and dispersions for the chemical coating industry. Many of these items are produced on a customer specific need.

DPC's operation consists of various milling, and blending techniques, to produce their products. These products generally consist of pigments (organic/inorganic/polyethylenes), resins (acrylics, alkyds, & epoxy based materials), surfactants, and solvents (xylene, mineral spirits, butanol, IPA, butyl cellosolv, etc...).

DPC begins their operation by first receiving their raw materials onsite. These materials are either received in drums, boxes, bags, or in bulk shipments. DPC has a number of both aboveground, and belowground (@20) tanks to store their raw materials (UST permit #0022376). From storage, the raw materials are either transferred, or directed piped into the appropriate mixing area.

DPC can produce their products by either blending, or milling the raw materials together. The only significant difference between the two, is that in the blending operation, the solvents are added directly into the mixing chamber (from the storage tank piping), along with the pre-measured resins, pigments, and surfactants. With the milling operation, as with the blending operation, the surfactants, resins, and pigments are weighed out

(prior to milling/blending to achieve the proper mixture), and are placed in either a portable tank, or pot. If the solution is to be run through the milling operation, then DPC adds the appropriate amount of solvent to the solution. These portable pots, or tanks are then brought to either an attritor, or a larger pebble mill, where they are dropped into the milling machine to be properly mixed.

Having been mixed, QC'd, and pumped to a storage tank/drum for shipment offsite, the pots and tanks are sent to the pot washing machine. Here DPC uses potassium hydroxide solution to remove any remaining residues from the pots/tanks. A drain at the bottom of the washing station catches the cleaning solution, and pipes it back to the aboveground storage tank (<1,000 gal.) which holds the potassium hydroxide solution. DPC does not consider the potassium hydroxide solution a hazardous waste until it loses it effectiveness in cleaning the dirty pots/tanks. Once the material is considered hazardous, it is drummed, and placed in DPC's hazardous waste storage area to await shipment offsite. DPC ships this material offsite, approximately every 8-10 months (when solution has become to saturated) as a D001, D007, D008, or D035 hazardous waste stream.

Having performed their mixing operations, the milling, and blending tanks need to be cleaned. The tanks/mills are first "washed" down with a solvent solution that is consistent with the solution just mixed inside of the tank/mill. This washing solution is then saved, and stored onsite until it is needed again in the production of the same product. Next, DPC washes the

tank/pot with butyl cellosolve. This material will absorb any remaining solvent, or moisture found within the tank/mills. This wash is saved onsite (usually in a drum), and is reused continuously, until the butyl cellosolv can no longer effectively retain the solvent, or water.

At this point, DPC contacts their hazardous waste hauler (Delaware Container) who pumps this material out of storage, and offsite as their "spent solvent" (D001, D035) waste.

Should any raw material, or wash/rinse material spill while in use, it is picked up, collected in a drum, and is also shipped offsite as a hazardous waste (D007, D008, or D035). If the spill is to large to handle at the source, every building has a collection system which carries all of the materials into one of three (3) separators, which are also periodically cleaned out.

The only other waste streams that PDC generates, concerns it's air purification system. This system removes nuisance odors & particles from the general working areas air, and also from the mixing containers (when in use). The air is first run through one of two dust collectors, to remove any solid particles found. These solids are then collected in a 55 gallon drum found at the bottom of the drum. Two of these drums were found to be actively accumulating hazardous waste. This "pigment dust" waste generally goes offsite as a D007, D008 material. No problems with these drums.

The air is then run through a vaulted, belowground, canister holding activated carbon. This vapor recovery system removes any solvents still found in the air. This canister holds @2,220 lbs.

of carbon, and is sent offsite as a F003 waste stream every 8-10 months. When the canisters control system indicates that the carbon is showing signs of retaining less of the solvent odors, the carbon is vacuumed out of the canister, and is replaced with fresh carbon.

DPC also utilizes a large amount of non-contact cooling water everyday. When the mills are in operation, they are cooled with water, which is either within a jacket around the mill, or is sprayed on the outside of the mill. This water is also directed into the collection separators, and is sent to the Passaic Valley Sewerage Commission (PVSC) under permit #31406514. DPC discharges @60,000 gallons of water daily to PVSC.

DPC's hazardous waste storage area was inspected during the facility tour. No problems were found in this area. All containers were found to be properly maintained onsite. A copy of DPC's most current waste inventory sheet, is attached to this report.

Next, DPC's required documentation review was performed. DPC's manifests were first reviewed. All of the manifests were found to be properly completed, and in compliance. No problems found. The other required paperwork was then reviewed, and here too, DPC was found to be in full compliance. No problems found.

No referral to the USEPA is needed in this case. DPC had all of the appropriate land disposal notifications onsite. For all applicable hazardous waste shipments that have gone offsite since their last RCRA inspection (5/23/90).

Since DPC was found to be in full compliance with all

Departmental, and RCRA requirements, I feel that no further enforcement action is needed at this time.

Addendum: DPC is currently undergoing a site evaluation under ECRA. ECRA was triggered when DPC's parent company (Synres Chemical Corporation) decided they wanted to sell the plant. DPC will probably change names when a new parent company buys the plant, but the operations will remain the same at this location. DPC's ECRA case number is 91-522, with the case manager being Mr. Bill Paterson.

SITE BACKGROUND INFORMATION

EMPLOYEES: 75 # YEARS IN OPERATION: 35 8 hr SHIFTS/WEEK: 1/5

ACRES: 2.6 acres # BUILDINGS: 14 PRODUCT PRODUCED /YR: Continuously

PREVIOUS OPERATIONS AT SITE: PAINT & VARNISH MANUFACTURING, IRON WORKS, TRUCKING CO.

WATER SUPPLY: JERSEY CITY WATER DEPARTMENT

MONITORING WELLS: 4 - involved w/ ECRA.

SANITARY DISPOSAL: ALLEGRO SANITATION (ID*27)

ENVIRONMENTAL PERMITS: UST permit *0022376, PASSAIC VALLEY SEWERAGE COMMISSION discharge permit *3140651 4.

CORPORATE INFORMATION: ———

PREVIOUS ENFORCEMENT HISTORY: last NJDEP inspection on 5/90. USEPA in early 12/91.

TANKS ON SITE: 20 underground tanks on-site (1,500 - 6,000 gal. cap.)

ADDITIONAL COMMENTS:

Describe the activities that result in the generation of hazardous waste.

SEE NARRATIVE

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

HAZARDOUS WASTE STORAGE AREA:

2-55gal. drums of PIGMENT DUST (D007, D008)

3-55gal. drums of SPILL CLEAN-UP MATERIAL - containing speedi-dry, hazorb pillows, and spilled product (D007, D008, D035)

9-55gal. of "SPENT SOLVENT" (D001)

1-55gal. drum of WASTEWATER (D007, D008, D035)

MAINTENENCE SHOP

1-55gal. drum (@½ full) X726 WASTE OIL.

HAZARDOUS WASTE TRACKING SHEET "B"

FOR FACILITIES THAT GENERATE, TREAT, OR STORE HAZARDOUS WASTE

HOUR/DATE	HAZARDOUS WASTE ID#	QUANTITY/UNITS	METHOD OF TSD	LOCATION WITHIN FACILITY	DESCRIPTION OF WASTE	LOT NUMBER	INSPECTOR	OUTGOING MANIFEST # (if applic)	DATE SHIPPED OFF-SITE
9:22/88		1/55 gal drum	S0-1	01A1	Pigment Dust	012292			
		1/55 gal drum	S0-1	01A1	Hazorb Pillows	012392-1			
		1/55 gal drum	S0-1	01A1	Dirty Speedy Dry	012392-2			
		1/55 gal drum	S0-1	01A1	Pigment Dust	012892-1			
		1/55 gal drum	S0-1	01A2	Spent Solvents	012492-1			
		1/55 gal drum	S0-1	01A2	Spent Solvents	012192-1			
		1/55 gal drum	S0-1	01A2	Wastewater	012992-1			
		1/55 gal drum	S0-1	01A2	Spent Solvents	013092-1			
		1/55 gal drum	S0-1	01A3	Spent Solvents	013192-1			
		1/55 gal drum	S0-1	01A3	Spent Solvents	020592-1			
		1/55 gal drum	S0-1	01A3	Spent Solvents	021092-1			
		1/55 gal drum	S0-1	01A4	Dirty Hazorb Pillows	020592-2			
		4/55 gal drums	S0-1	01B1	Spent Solvents	021392-4			
		2/55 gal drums	S0-1	01B2	Spent Solvents	021492 3-4			
		1/55 gal drum	S0-1	01B2	Spent Solvents	022092 1-2			

GENERAL CHECKLIST

		YES	NO	N/A
GENERAL				
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓		
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓		
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	✓		
	Is the waste hazardous?	✓		
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	✓		
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).			
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4(a)4vii	Did the generator describe all N.O.S. wastes in Section J?	✓	—	—
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	✓	—	—
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓	—	—
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓	—	—
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓	—	—
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓	—	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓	—	—
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	—	—	✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	✓

7:26-9.3 **Accumulation Time**

How is waste accumulated on site?

(✓) Containers
(__) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(__) Tanks (less than 90 days)
(__) Above ground
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

		YES	NO	N/A
7:26-9.3(a)1	Is waste accumulated for more than 90 days?	__	✓	__

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

		YES	NO	N/A
Containers				
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). SEE NARRATIVE	—	—	—
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	✓	—	—
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)4i	Are all containers securely closed except those in use?	✓	—	—
7:26-9.4(d)4iii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	✓	—	—
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?	✓	—	—
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	✓	—	—
7:26-9.4(d)5	Is the container storage area inspected at least daily?	✓	—	—
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?	✓	—	—
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?	✓	—	—
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?	✓	—	—

		YES	NO	N/A
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	✓	—	—
Tanks (Less than 90 day storage)				
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	—	—	✓
	If yes, describe the tank(s): 1) Capacity _____ 2) Shell thickness _____ 3) Material Construction _____ 4) Age of tank _____			
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?	—	—	—
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	—	—	—
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	—	—	—
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?	—	—	—
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?	—	—	—
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part?	—	—	—
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?	—	—	—
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling?	—	—	✓

		YES	NO	N/A
7:26-10.5(c)2ii	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?			
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?			
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?			
7:26-10.5(d)1i	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?			
7.26-10.5(d)ii	Does the containment system consist of material compatible with the wastes being stored?			
7:26010.5(d)iii	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?			
7:26-10.5(d)iii	Is the tank protected from contact with accumulated liquids?			
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?			
7:26-10.5(d)2	Is run-on into the containment area prevented?			
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?			
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?			

		YES	NO	N/A
7:26-10.5(d)4i	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?			✓
7:26-9.4(g)4	**Personnel Training** Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓		
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	✓		
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓		
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓		
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	✓		
7:26-9.4(g)6iii	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	✓		
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	✓		
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		

		YES	NO	N/A
7:26-9.6	**Preparedness and prevention**			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	✓	—	—
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓	—	—
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓	—	—
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?	✓	—	—
7:26-9.6(c)	Is equipment tested and maintained?	✓	—	—
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	✓	—	—
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	✓	—	—
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓	—	—
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:	✓	—	—
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.	✓	—	—

RIGHT-TO-KNOW Contingency Plan Update in Oct. 1991.

		YES	NO	N/A
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority? JERSEY CITY F.D. and P.D. only.	✓	—	✓
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies? CLEAN VENTURE	✓	—	—
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	✓	—	—
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? OCTOBER 1991 was last inspection (10/25/91)	✓	—	—
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.	✓	—	—
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?	✓	—	—
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	—	—	✓
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?	—	—	✓
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?	—	—	✓

		YES	NO	N/A
7:26-9.7	Contingency Plan and Emergency Procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?	✓		
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?			✓
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	✓		
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.	✓		
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	✓		
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	✓		

		YES	NO	N/A
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?	✓		
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?	✓		
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?	✓		
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility;	✓		
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?	✓		
7:26-9.7(k)	Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?	✓		

DRAFT

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: DANIEL PRODUCTS CO.

U.S. EPA I.D. No.: NJD001340686

Street: 400 CLAREMONT AVE.

City: JERSEY CITY **State:** NJ **Zip** 07305

Telephone: (201) 432-0800

Inspection Date: 2/24/92 **Time:** _____(am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	STEPHAN SZARDENINGS	NJDEPE-DFWE	(201) 669-3900
Facility Representatives:	DENNIS KELEMEN	ASST. PLANT MANAGER	(201) 432-0800

	Generate	Transport	Treat	Store	Dispose
F-Solvent	* (*)				
Dioxin					
California List					
First Third [268.10]					
Second Third [268.11]					
Third Third [268.12]	*				

(*) F003 is an overclassification of the waste being shipped off-site.

DRAFT

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

DRAFT

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

A. Does the facility handle the following wastes?

1. F001 through F005 spent solvents

   Yes ✓ No ___ List* F003

2. F020-F023 and F026-F028 dioxin-containing wastes

   Yes ___ No ✓ List* _____

3. California List Wastes
   (See Appendix A for potential California list applicability)

   Yes ___ No ✓ List* _____

4. First Third Wastes [268.10]

   Yes ___ No ✓ List* _____

5. Second Third Wastes [268.11]

   Yes ___ No ✓ List* _____

6. Third Third Wastes [268.12]**

   Yes ✓ No ___ List* D001, D007, D008, D035.

* List wastes if room allows or attach Appendix A.
** Note: Effective 09/25/90 large quantity generators and TSDs must use the Toxicity Characteristic Leaching Procedure (TCLP) instead of the Extraction Procedure (EP) for determining the Toxicity Characteristic. Small quantity generators must comply with this new requirement for 03/25/91.

B. Waste Code Determination

1. Has the facility correctly identified all wastes for purposes of compliance with Part 268? (Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.)

   Yes ✓ No ___

If no, list below:

Assigned Classification	Correct Classification

Comments: _____

2. Has the facility assigned both the listed and characteristic waste code, where a listed waste exhibits a characteristic? [268.9(a)]

Yes ✓ No ___ NA ___

C. Does the facility handle the following wastes (national capacity variances)?

1. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, K071 (expires - 08/08/90).

Yes ___ No ✓

Comments _____

2. Contaminated soil and debris which had treatment standards based on incineration set in the First Third Rule - K015, K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K083, K086, K087, K101, K102, K103, and K104 (expires - 08/08/90).

Yes ___ No ✓

Comments _____

3. All wastes with a treatment standard set in the Third Third rule (includes wastes which previously fell under the soft hammer provision (expires - 08/08/90).

Yes ___ No ✓

Comments _____

4. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (expires - 11/08/90). [268.30(c)]

Yes ___ No ✓

Comments _____

5. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [268.31(b)]

Yes ___ No ✓

Comments _____

6. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [268.32(d)(2)]

Yes ___ No ✓

Comments _____

7. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [268.34(d)]

Yes ___ No ✓

Comments _____

8. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, vitrification, or wet air oxidation - F039, K031, K071, K084, K101, K102, K106, P010, P011, P012, P015, P036, P038, P065, P073, P087, P092, P103, P114, U136, U151, U204, U205, D001(ignitable liquids mixed with sludges and solids), D004, D006 (cadmium batteries), D009 (expires - 05/08/92). [268.35(e)]

Yes ___ No ✓

Comments _____

9. The following non-wastewaters - F019, K031, K071, K084, K101, K102, K106, P010, P011, P012, P015, P036, P038, P065, P073, P087, P092, P103, P114, U136, U151, U204, U205, D004, D006 (cadmium batteries), D007(refractory brick), D008(slag and matte generated from secondary smelting process), D009, D010 (expires - 05/08/92). [268.35(b)]

Yes ___ No ✓

Comments _____

10. F039 multi-source leachate (non-wastewaters) derived from disposal of any listed waste, and any leachate that exhibits a characteristic of hazardous waste (effective date - 05/08/92). [268.35(c)]

Yes ___ No ✓

Comments _____

11. Mixed radioactive/hazardous wastes (expires - 05/08/92). [268.35(d)]

Yes ___ No ✓

Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If yes, list the waste code(s) and check the treatability group for each.

Waste Code	Wastewater*	Non-wastewater
F003		✓

* Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents. [268.2(a)(6)(i)]

Comments _____

2. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

   Yes ✓ No ___ NA ___

   If yes, list each waste code and check the correct treatability group:

Waste Code*	Wastewater**	Non-wastewater
D001		✓
D007, D008, D035		✓

* Include subcategory

** Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 - less than 5% by weight TOC and less than 1% TSS; K025, K103, and K104 - less than 4% by weight TOC and less than 1% TSS. [268.2(a)(ii-iv)]

Comments _____

b. Does the assigned treatment standard for listed wastes cover constituents that may cause the waste to exhibit any characteristics?

Yes ✓ No ___ NA ___

c. Does the generator specify the alternate treatment standards for lab packs?

Yes ___ No ___ NA ✓

If yes, do lab packs contain the following wastes exclusively?

	Yes	No
Organics: Part 268, Appendix V constituents	___	___
Inorganics: Part 268, Appendix IV constituents	___	___

d. Does the generator specify alternate treatment standards for F039 multi-source leachate?

Yes ___ No ___ NA ✓

If yes, was the leachate derived from the treatment, storage, disposal, or recycling of more than one listed waste?

Yes ___ No ___

Comments _____

_____

3. California List Wastes: Has the generator correctly identified the treatability group and/or treatment standard/prohibition level for the following wastes?

a. Liquid hazardous wastes containing PCBs ≥50ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs

___ ≥500 ppm PCBs

b. Wastes identified as hazardous by a characteristic property that does not involve HOCs, containing ≥1,000mg/l (liquids) or mg/kg (non-liquids) HOCs

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)

___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

Comments _____

d. National Capacity Variance Wastes: Has the generator correctly identified California List prohibitions/treatment standards which are applicable to First, Second and Third Third wastes which have national capacity variances in effect? (see pages 4-6 for national capacity variances in effect and Appendix A for potential California List applicability)

Yes ___ No ___ NA ✓

If yes, list each waste code, California List waste applicability, and the expiration date of the national capacity variance.

Waste Code	Cal List Applicability	Expiration Date
		/ /
		/ /
		/ /

Comments _____

4. Treatment standards expressed as specified technologies: Has the generator specified an alternative method to that required in 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 268.42, the alternative method, and documentation of approval.

Waste Code	268.42 Technology	Alternative Method	Approval

Comments _____

5. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓

Comments _____

If yes, did the generator select the most stringent treatment standards? [268.41/.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether the restricted waste exceeds treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ✓ No ___

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Does the generator make this determination using:

a. Knowledge of waste:

Yes ✓ No ___ NA ___

If yes, list the wastes for which "applied knowledge" was used and describe the basis of determination. Attach documentation.

F003, D001, D007, D008, D035

Was all supporting data retained on site? [268.7(a)(5)]

Yes ✓ No ___ NA ___

b. TCLP*: Are wastes with treatment standards specified in 268.41 analyzed using TCLP? (BDAT** = immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [Part 261, Appendix II, EPA Test Method 1311)
**BDAT = best demonstrated available technology

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
Same as listed in B.2.a.

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology)

Yes ✓ No ___ NA ___

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
Same as listed in B.2.a.

d. pH ≤ 2:

Yes ___ No ___ NA ✓

If yes, list the wastes for which pH testing was used and provide the date of the last test, the frequency of testing, and note any problems. Attach test results.

e. PFLT*: Was PFLT used specifically to determine if California List wastes were contained in liquid hazardous waste?

Yes ✓ No ___ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
Same as listed in B.2.a.

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 262.34?

Yes ___ No ✓ (If no, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted?

Yes ___ No ___ (If no, go to 4)

Does the plan provide the following?

	Yes	No
Detailed chemical and physical analysis of the restricted waste as justification for frequency of testing	___	___
Necessary information to treat the wastes in accordance with Part 268 requirements	___	___
Discussion of number of wastes treated, their variability, and variability of the treatment process	___	___

Comments _____

Has the plan been filed with the Regional Administrator? (return receipt, Federal Express slip, etc. for verification)

Yes ___ No ___ NA ___

4. Dilution Prohibition [268.3]:

a. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No ✓

If yes, list the wastes _____

Are the wastes susceptible to co-treatment?

Yes ___ No ___ NA ✓

Comments _____

b. Does the generator dilute restricted wastes as a substitute for adequate treatment?

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 268.41 and 268.43?

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

Comments _____

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

If yes, the TSD Checklist must be completed.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds the treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ✓ No ___ (If no, go to 3)

If yes, identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Subsequent Handler
F003	ENVIROTROL, INC – Beaver Falls, PA
D001	S&W WASTE = Kearny, N.J.
D007, D008, D035	" " = " , "

b. Does the generator provide notifications to the treatment or storage facility? [268.7(a)(1)]

Yes ✓ No ___ (If no, go to 3)

If yes, does the notification contain the following?

EPA Hazardous waste number(s) (including all wastes contained in a lab pack)	Yes ✓	No ___	
Lab pack certification [268.7(a)(8)(i)]*	Yes ___	No ___	NA ✓
Applicable treatment standards/ prohibitions levels for F-solvents, F039 multi-source leachate, and California list wastes	Yes ✓	No ___	NA ___
Referenced treatment standards for all other wastes	Yes ✓	No ___	NA ___
Manifest number	Yes ✓	No ___	

GEN

Waste analysis data, if available Yes ✓ No ___

* Required only if alternative treatment standards are specified

c. Is a notification sent with each waste shipment?

Yes ✓ No ___ (If yes, go to 3)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets the treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If no, go to 4)

If yes, identify waste code(s) and off-site disposal facilities:

Waste Code	Facility
_____	_____
_____	_____
_____	_____

b. Does the generator provide notification and certification to the disposal facility? [268.7(a)(2)]

Yes ___ No ___ (If no, go to 4)

If yes, does notification contain the following?

EPA Hazardous waste number(s) (including all wastes contained in a lab pack) Yes ___ No ___

Lab pack certification [268.7(a)(8)(i)]*	Yes___	No___	NA___
Applicable treatment standards/ prohibitions levels for F-solvents, F039 multi-source leachate, and California list wastes	Yes___	No___	NA___
Referenced treatment standards for all other wastes	Yes___	No___	NA___
Manifest number	Yes___	No___	
Waste analysis data, if available	Yes___	No___	
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes___	No___	

* Required only if alternative treatment standards are specified

c. Is notification and certification sent with each waste shipment?

Yes___ No___ (If yes, go to 4)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes___ No___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes___ No___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a TSD which are subject to a national capacity variance*, case-by-case extension (268.5), or no migration petition (268.6)? (see pages 4-6 for national capacity variances)

Yes ___ No ✓ (If no, go to 5)

*Note that the requirements of this section apply to all wastes granted an extension in the Third Third rule from 05/08/90 to 08/08/90. Some of these wastes previously fell under the soft hammer provision.

If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [268.7(a)(3)]

Yes ___ No ___ (If no, go to 5)

If yes, does the notification contain the following information?

EPA Hazardous waste number(s)	Yes ___	No ___	
Applicable treatment standards for F039 multi-source leachate	Yes ___	No ___	NA ___
Referenced treatment standards for all other wastes	Yes ___	No ___	NA ___
Manifest number	Yes ___	No ___	
Waste analysis data, if available	Yes ___	No ___	
Date the waste is subject to the prohibitions	Yes ___	No ___	

b. Is a notification sent with each waste shipment?

Yes ___ No ___ (If yes, go to 5)

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___

If yes, list waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [268.7(a)(9)]

Yes ___ No ___

5. Records Retention

a. Does the generator retain on site copies of all notifications, certifications, and soft hammer demonstrations/certifications for a period of 5 years? [268.7(a)(6)]

Yes ✓ No ___

Comments _____

b. Do these documents reflect proper management of wastes previously covered under expired national capacity variances and the soft hammer provision*? (See Appendix C)

Yes ✓ No ___ NA ___

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

D. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ✓

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

Yes ___ No ___ NA ✓

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ___ NA ✓

Comments _____

If yes, the TSD checklist must be completed.

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	✓ No
trichloroethylene	___Yes	✓ No
methylene chloride	___Yes	✓ No
1,1,1-trichloroethane	___Yes	✓ No
carbon tetrachloride	___Yes	✓ No
chlorinated fluorocarbons	___Yes	✓ No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	✓ No
trichloroethylene	___Yes	✓ No
methylene chloride	___Yes	✓ No
1,1,1-trichloroethane	___Yes	✓ No
chlorobenzene	___Yes	✓ No
trichlorofluoromethane	___Yes	✓ No
1,1,2-trichloro-1,2,2-trifluoroethane	___Yes	✓ No
ortho-dichlorobenzene	___Yes	✓ No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	✓ Yes	___No
acetone	___Yes	✓ No
ethyl acetate	___Yes	✓ No
ethyl benzene	___Yes	✓ No
ethyl ether	___Yes	✓ No
methyl isobutyl ketone	___Yes	✓ No
n-butyl alcohol	___Yes	✓ No
cyclohexanone	✓ Yes	___No
methanol	___Yes	✓ No
	___Yes	✓ No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ✓ No

→ But, solvent odors are absorbed in emissions control device, via activated carbon).

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	✓No
nitrobenzene	___Yes	✓No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	___Yes	✓No
methyl ethyl ketone	___Yes	✓No
carbon disulfide	___Yes	✓No
isobutanol	___Yes	✓No
pyridine	___Yes	✓No

(*) SOLVENTS FOUND/LISTED (*) IN FRONT PAGE ARE NOT USED FOR "SOLVENT PROPERTIES", BUT THEY ARE A CONSTITUENT OF THE PRODUCTS BEING PRODUCED. SOLVENT ODORS ARE DRAWN OFF FROM BLENDING/MILLING OPERATION AND RUN THROUGH AIR EMISSIONS CONTROL UNIT. THE "F003" APPEARS TO BE AN OVERCLASSIFICATION.

Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___Yes ✓No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

___Yes ✓No

If yes, list the constituents.

_____

_____

(c) Are the constituents used as diluents?

___Yes ✓No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?

___Yes ✓No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

___Yes ✓No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

___Yes ✓No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

___Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

Waste Minimization Checklist

GENERATOR CHECKLIST

MANIFEST

GENERAL 262.20	YES	NO	N/A
Does the generator, offer for tranportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.	✓		
262.23			
Does the generator sign the manifest certification which states;	✓		
" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the enviroment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."			
Does the generator have a written Waste Minimization Plan?		✓	
If no, is the generator able to describe his plan orally.	✓		

COMMENTS:
(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

Employee Training
Waste Audits (also recent inspections by NJDEPE & USEPA)
Good Operating Practices
Use & Reuse Practices — Solvent wash reuse in raw material/product manufacturing.
Reclamation Practices.
Generate F waste (solvent in carbon bed), Carbon bed is reactivated at David's TSD facility and is brought back =

when next shipment due offsite.

Use a vacuum system to draw off solids. Solids accumulate in a 55 gal. drum. When process done, the drum holding the solids is saved, and reused when the particular ingredient is needed again.

ANNUAL/BIENNIAL REPORT

262.41

	YES	NO	N/A
- Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropiate regulatory agency? HAZARDOUS WASTE GENERATOR'S REPORT.	✓	—	—

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)

Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?	—	✓	—
Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?	✓	—	—
Do these efforts match the information contained in the generator's written or verbally described waste minimization program. SOME WASTE STREAMS HAVE BEEN REDUCED, BUT OTHERS HAVE GROWN — DUE TO INCREASE OF PRODUCT PRODUCTION	✓	—	—
Is the BER or AR certification signed by the generator or authorized representatives?	—	—	✓(N/A)

TSDF CHECKLIST

The inspector should review a copy of the AR/BER prior to the inspection, and should try to verify the information in the report during his inspection. The following question should be addressed during the inspection.

	YES	NO	N/A
Does the AR/BER include the efforts undertaken during the year to reduce the volume of toxicity of the waste generated?			✓
Does the AR/BER include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?			✓
Doe these efforts match the information contained in the generator's written or verbally described waste minimization program.			
Is the AR/BER certification signed by the generator or authorized representatives?			✓
264.75/265/75 (h-j) Does the generator treat, store and dispose hazardous waste on site?		✓	
If yes to the above question, does the generator submit BERs or ARs to the appropiate regulatory agency?			

TOXICITY CHARACTERISTIC ("TC") INSPECTION CHECKLIST

1. Has the handler tested all its solid waste streams using the TCLP?

   Yes ✓ No_____

   a) If no, are there any waste streams which should be tested.

   Explain _____

   b) If the handler is a TSD, has the owner/operator revised its waste analysis plan to incorporate the new TCLP requirements?

   Yes_____ No N/A

2. Does the handler generate waste exceeding the regulatory level for any constituent listed in Table I-TC?

   Yes ✓ No_____

   If no this checklist need not be completed.

3. Was the handlers waste(s) considered a federal hazardous waste prior to the promulgation of the new TCLP requirement?

   Yes ✓ No_____

   If No, proceed to question number 4. If yes, answer questions 3a), 3b) and 3c) and then stop.

   a) Have both the listed and characteristic waste code been assigned, were a listed waste exhibits a characteristic for which the waste is not listed?

   Yes_____ No_____

   Comments _____

   b) Does the handler determine and list on its manifests all of it's waste(s) TCLP characteristics?

   Yes_____ No_____

   Comments _____

c) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request indicating the new hazardous constituent(s) found in their waste(s)?

Yes_____ No_____

4. Is the waste managed as a hazardous waste?

Yes ✓ No_____

If No, this is a high priority violation. Be sure to obtain a detailed description of the wastes final disposition.

Comments _____

a) If the generator is also a TSD, has the owner or operator submitted a revised Part A permit application or if permitted a permit modification request for the previously unregulated waste or hazardous waste unit which has become subject to hazardous waste regulation as a result of the new TC Rule?

Yes_____ No N/A

NOTE: The inspector should bear in mind that any waste stream, unit or handler newly regulated on account of the change in the analytical procedures associated with the Toxicity Characteristic may now be subject to all the applicable requirements of N.J.A.C. 7:26-1, 7 - 12 and 40 C.F.R. Parts 260 - 270. All applicable current checklists should be used to determine compliance status.

EFFECTIVE DATES FOR COMPLIANCE WITH TC REQUIREMENTS

Generators of ≥1,000 kg/mo. of hazardous waste	9/25/90
Generators of <1,000 kg/mo. of hazardous waste	3/29/91

ADDITIONAL COMMENTS:_____

E: fix file / make new file folder.

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
-DANIEL PRODUCTS CO 400 CLAREMONT AVE JERSEY CITY , NJ NJD001340686	ENVIROTROL INC 24TH ST EXT & 31ST ST BEAVER FALLS , PA PAD980707087	[redacted]		F003	NON HAL SOLV & STLBTM	22000 P
		[redacted]		F003	NON HAL SOLV & STLBTM	22000 P
		PAC1303245	08/02/90	F003	NON HAL SOLV & STLBTM	22000 P
		PAC3532233	06/04/91	F003	NON HAL SOLV & STLBTM	22000 P
	S & W WASTE INC 105 JACOBUS AVENUE SO KEARNY , NJ NJD991291105	[redacted]		D007	CHROMIUM	110 G
				D007	CHROMIUM	132 P
				D001	CHARACTERISTIC OF IGNITABILITY	795 G
				D007	CHROMIUM	698 P
		[redacted]		D007	CHROMIUM	796 P
				D007	CHROMIUM	110 G
				D001	CHARACTERISTIC OF IGNITABILITY	330 G
				D007	CHROMIUM	143 P
				D001	CHARACTERISTIC OF IGNITABILITY	275 G
				D007	CHROMIUM	220 G
				D001	CHARACTERISTIC OF IGNITABILITY	500 G
		[redacted]		X850	PACKED LABORATOR CHEMICALS	10 P
				X850	PACKED LABORATOR CHEMICALS	10 P
				X850	PACKED LABORATOR CHEMICALS	150 P
				X850	PACKED LABORATOR CHEMICALS	100 P
		[redacted]		D002	CHARACTERISTIC OF CORROSIVITY	918 G
		[redacted]		D001	CHARACTERISTIC OF IGNITABILITY	220 G
				D001	CHARACTERISTIC OF IGNITABILITY	55 G
				D001	CHARACTERISTIC OF IGNITABILITY	55 G
				D001	CHARACTERISTIC OF IGNITABILITY	1210 G
				D007	CHROMIUM	2000 P
		[redacted]		D007	CHROMIUM	3600 G
		[redacted]		D007	CHROMIUM	2390 P
				D008	LEAD	175 G
				D001	CHARACTERISTIC OF IGNITABILITY	1540 G
				D001	CHARACTERISTIC OF IGNITABILITY	110 G
				D007	CHROMIUM	725 P

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st inspected on
5/23/90.

other manifests reviewed
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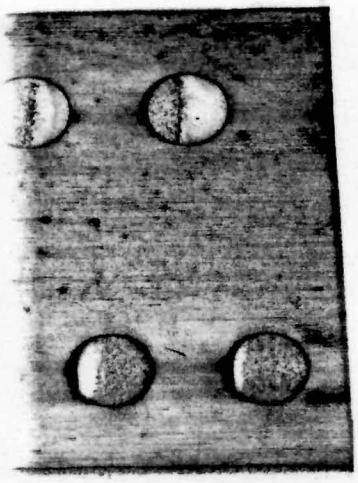
02/13/92

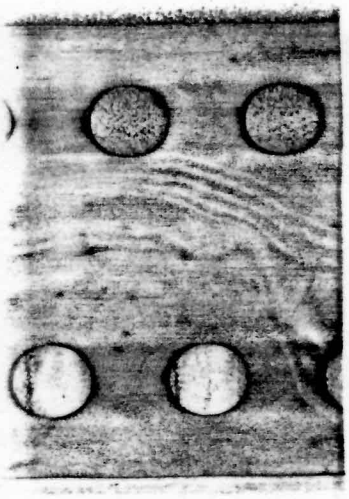
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
WASTE MANIFESTS FROM 01/01/88 TO 02/13/92
FROM GENERATOR NJD001340686 TO SPECIFIED TSDF'S

GENERATOR | TSDF | MANIFEST | DATE SHIPPED | WASTE CODE | WASTE NAME | QUANTITY
-DANIEL PRODUCTS CO | S & W WASTE INC
400 CLAREMONT AVE | 105 JACOBUS AVENUE

JERSEY CITY , NJ NJD001340686	SO KEARNY , NJ NJD991291105	[redacted]	D007 CHR[redacted]UM	55 G
			D001 CHA[redacted]TERISTIC OF IGNITABILITY	110 G
			D001 CHARACTERISTIC OF IGNITABILITY	220 G
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	330 G
			D001 CHARACTERISTIC OF IGNITABILITY	55 G
			D007 CHROMIUM	202 P
			D001 CHARACTERISTIC OF IGNITABILITY	1430 G
			D001 CHARACTERISTIC OF IGNITABILITY	220 G
			D008 LEAD	55 G
			D007 CHROMIUM	1378 P
			X910 CHEMICAL PROCESS-SOLID,NOS	1964 P
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	828 G
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	950 G
		[redacted]	D007 CHROMIUM	519 P
			D001 CHARACTERISTIC OF IGNITABILITY	1100 G
			D001 CHARACTERISTIC OF IGNITABILITY	385 G
			D007 CHROMIUM	197 P
		[redacted]	D007 CHROMIUM	1113 P
			D001 CHARACTERISTIC OF IGNITABILITY	1485 G
			D001 CHARACTERISTIC OF IGNITABILITY	495 G
			D007 CHROMIUM	207 P
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	1375 G
			D001 CHARACTERISTIC OF IGNITABILITY	330 G
			D008 LEAD	3333 P
			D007 CHROMIUM	325 P
		[redacted]	D008 LEAD	1605 P
			D008 LEAD	275 G
			D001 CHARACTERISTIC OF IGNITABILITY	1595 G
			D001 CHARACTERISTIC OF IGNITABILITY	220 G
			D001 CHARACTERISTIC OF IGNITABILITY	605 G
			D001 CHARACTERISTIC OF IGNITABILITY	220 G
			D001 CHARACTERISTIC OF IGNITABILITY	110 G
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	2700 G
		[redacted]	D001 CHARACTERISTIC OF IGNITABILITY	1000 G
		[redacted]	D008 LEAD	1533 P

GENERATOR	TSDF	MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
-DANIEL PRODUCTS CO 400 CLAREMONT AVE JERSEY CITY , NJ NJD001340686	S & W WASTE INC 105 JACOBUS AVENUE SO KEARNY , NJ NJD991291105	[redacted]		D001	CHARACTERISTIC OF IGNITABILITY	1155 G
				D001	CHARACTERISTIC OF IGNITABILITY	55 G
				D008	LEAD	275 G
				D001	CHARACTERISTIC OF IGNITABILITY	110 G
		[redacted]		D001	CHARACTERISTIC OF IGNITABILITY	1000 G
		[redacted]		D008	LEAD	1110 P
				D001	CHARACTERISTIC OF IGNITABILITY	1980 G
				D007	CHROMIUM	242 P





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02/13/92
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GENERATOR
-DANIEL PRODUCTS CO
400 CLAREMONT AVE
JERSEY CITY , NJ
NJD001340686

TSDF
S & W WASTE INC
105 JACOBUS AVENUE
SO KEARNY , NJ
NJD991291105

NJA0946643 08/02/90 C123 ARSENIC AND COMPOUNDS,N.O.S. 1126 P
D001 CHARACTERISTIC OF IGNITABILITY 1980 G
D008 LEAD 208 P

NJA0957868 12/27/90 D001 CHARACTERISTIC OF IGNITABILITY 990 G
D001 CHARACTERISTIC OF IGNITABILITY 330 G
D035 METHYL ETHYL KETONE 994 P
D008 LEAD 55 G

NJA0958378 03/18/91 D035 METHYL ETHYL KETONE 2029 P
D001 CHARACTERISTIC OF IGNITABILITY 1595 G
D001 CHARACTERISTIC OF IGNITABILITY 990 G

NJA0958511 11/08/90 D002 CHARACTERISTIC OF CORROSIVITY 5400 G

[redacted] D007 CHROMIUM 714 P
D001 CHARACTERISTIC OF IGNITABILITY 1210 G
D001 CHARACTERISTIC OF IGNITABILITY 165 G
D007 CHROMIUM 166 P

NJA1013897 06/15/90 C319 METHYL ETHYL KETONE (MEK) 570 P
D001 CHARACTERISTIC OF IGNITABILITY 2915 G
D001 CHARACTERISTIC OF IGNITABILITY 55 G
D008 LEAD 165 G

NJA1049665 05/30/91 D001 CHARACTERISTIC OF IGNITABILITY 2200 G

NJA1050204 10/25/90 C319 METHYL ETHYL KETONE (MEK) 1469 P
D008 LEAD 2090 P
D001 CHARACTERISTIC OF IGNITABILITY 110 G
D008 LEAD 385 G
D008 LEAD 228 P

NJA1156775 04/25/91 D035 METHYL ETHYL KETONE 912 P

DIVISION OF HAZARDOUS WASTE MANAGEMENT
WASTE MANIFESTS FROM 01/01/88 TO 02/13/92
FROM GENERATOR NJD001340686 TO SPECIFIED TSDF'S

MANIFEST	DATE SHIPPED	WASTE CODE	WASTE NAME	QUANTITY
NJA1156775	04/25/91	D001	CHARACTERISTIC OF IGNITABILITY	1485 G
		D001	CHARACTERISTIC OF IGNITABILITY	990 G
		D008	LEAD	682 P
NJA1157240	06/21/91	D035	METHYL ETHYL KETONE	4838 P
		D001	CHARACTERISTIC OF IGNITABILITY	1045 G
		D001	CHARACTERISTIC OF IGNITABILITY	550 G
		D001	CHARACTERISTIC OF IGNITABILITY	495 G
		D007	CHROMIUM	110 G
NJA1157447	07/17/91	D001	CHARACTERISTIC OF IGNITABILITY	2863 G
NJA1177697	11/08/91	D035	METHYL ETHYL KETONE	500 P
		D008	LEAD	1232 P
		D007	CHROMIUM	440 G
		D007	CHROMIUM	440 G
		D035	METHYL ETHYL KETONE	1900 P
		D001	CHARACTERISTIC OF IGNITABILITY	330 G
		D001	CHARACTERISTIC OF IGNITABILITY	1045 G
		D001	CHARACTERISTIC OF IGNITABILITY	220 G
NJA1177729	11/21/91	X910	CHEMICAL PROCESS-SOLID,NOS	6500 P
NJA1177992	08/29/91	D035	METHYL ETHYL KETONE	681 P
		D001	CHARACTERISTIC OF IGNITABILITY	1430 G
		D001	CHARACTERISTIC OF IGNITABILITY	550 G
		D001	CHARACTERISTIC OF IGNITABILITY	275 G
		D007	CHROMIUM	275 G
		D008	LEAD	262 P